

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**DECLARATION OF STEVEN SILVERS IN  
SUPPORT OF THE TWO HUNDRED FORTY-FIRST  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

I, Steven Silvers, make this declaration under 28 U.S.C. § 1746, and state:

1. I am a Senior Vice President at Lehman Commercial Paper Inc. ("LCPI") currently working in connection with the above referenced chapter 11 cases (the "Chapter 11 Cases") of Lehman Brothers Holdings Inc. and certain of its affiliates (the "Debtors"). I make this declaration in support of the Debtors' Two Hundred Forty First Omnibus Objection To Claims (No Liability Claims).

2. Attached to this declaration are two screen shots from the Debtors' records that indicate the location of the collateral referred to in Claim No. 27730 (the "Collateral"). Prior to the commencement of the Chapter 11 Cases, trades such as the one described in Claim No. 27730 were booked through the MTS system. The MTS system is no longer operational. However, the Debtors have access to a data depository that contains certain information previously stored in the MTS system. Attached hereto as Exhibit A is a screenshot of this data depository, that indicates that the Collateral was held in account G4SX on September 18, 2008. Account G4SX is an internal account in the MTS system where the trade described in Claim No. 27730 was booked. Account G4SX was an account of Lehman Brothers Inc. The screenshot

also indicates that the particular trade described in Claim No. 27730 was booked with company G. Company G is the code used by the MTS system for trades with Lehman Brothers Inc.

3. Attached hereto as Exhibit B is a screen shot from the data depository from Pathfinder, a different system where all Lehman accounts were set up. Exhibit B indicates that account G4SX is assigned to legal entity Lehman Brothers Inc.

4. These screenshots demonstrate that the transaction underlying Claim No. 27730 was with LBI. Based on the foregoing, Claim No. 27730 should be either disallowed or withdrawn.

I declare under penalty of perjury that, to the best of my knowledge, and after reasonable inquiry, the foregoing is true and correct.

Dated: April 30, 2012  
New York, New York

/s/ Steven Silvers  
Steven Silvers

**EXHIBIT A**

**Screen Shots of Data Previously Stored in the MTS System**

BusinessObjects InfoView - Windows Internet Explorer

https://bo.forensicsanddiscovery.com/InfoViewApp/Listing/mean.do?appId=InfoView&service=%2FInfoViewApp%2Fcommon%2FappService.do

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BusinessObjects InfoView

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Web Intelligence - MTS TRADE HISTORY DATA

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MTS TRADE HISTORY DATA

Records Found: 1

Trade No	Buy/Sell	Trade Type	Security Descriptor	Security #	Cusip	Acct Name	Acct Nbr	E/D
8SLK9P0	S	RR	FEDERAL HOME LOAN BANK SYSTEM	3133XJBF4	3133XJBF4	ISRAEL DISCOUNT BANK OF NEW	6624520	9/18/2008

MTS - By Customer MTS - By Security MTS - By Ledger MTS - By Pool

Discussions

Refresh Date: April 16, 2012 9:56:48 AM GMT-05:00

The list pane is updated.

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BusinessObjects InfoView - Windows Internet Explorer

https://boi.forensicsdiscovery.com/ir/ViewApp/Listing/main.do?app=ir-irViewUserView=%2Fir/ViewApp/%2Fcommon/%2FappService.do

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BusinessObjects InfoView

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Web Intelligence - MTS TRADE HISTORY DATA

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Acct Nbr	E/D	T/D	S/D	Net Amount	Company Code	Ledger	Price	Qty	Pool Nbr	Rank
6624520	9/18/2008	8/27/2008	9/18/2008	2,481,184.13 G		4SX	70.75	3,500,000.00		

MTS - By Customer MTS - By Security MTS - By Ledger MTS - By Pool

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Discussions

The list pane is updated.

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**EXHIBIT B**

**Screen Shot of Data Previously Stored in Pathfinder**

https://bo.to/eniscandiscovery.com/?bypassLatestInstance=true&caWebSite=Inf=true&appKind=Inf - Windows Internet Explorer

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Refresh Data Track

### Trading Account Maintenance

#### Account Information

Source:   
Account:   
Global Key:   
EAM ID (link):   
Description:   
Lead Account:   
Description:   
Mgt Code:  Comp Code:   
Description:

#### BookMap Information

Book ID:   
System:   
Book Name:   
Site:   
Company:   
Desk:   
ITS Account:   
SCS:

#### BPM Rollup Information

Division:   
Prod Level 0:   
Prod Level 1:   
Prod Level 2:   
Inc Location:   
Region:   
Legal Entity:

#### BookMap Rollup Information

Business Line:   
Trader:   
Flash Summary:   
Flash Detail:

#### Owners Information

Operations:   
Finance:   
Trader:   
Sector:

#### Account Attributes

Functional Unit:  Active: ☐  
Strategy:  Trader Hedge:  Exposure:   
Banking Mode:  TMS P&L Center:  MTM vs Accrual:   
Clean P&L Ind:  BPM2 Default:  TMS Trade Area:   
Legal Entity Trading Banking Ind:  Holding Comp Trading Banking Ind:

#### On Flash Indicator Information

Flash:  Flash-illo Reason Code:

#### BookMap Account Attributes

Payment:   
Risk:   
SCS Line:   
Pnl Location:   
Margin:   
Margin Valid:   
Margin Comment:

#### Production Income Management Codes

Trading Account Maintenance

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